

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,

Plaintiff,

v.

FELICIA FRANKLIN, in her
individual and official capacities;
ALIEKA ANDERSON, in her
individual and official capacities;
GAIL HAMBRICK, in her
individual and official capacities;
and CLAYTON COUNTY,
GEORGIA,

Defendants.

Civil Action Number:
1:22-CV-04149-WMR

CONSENT MOTION TO RESCHEDULE MOTIONS HEARING

COMES NOW Defendant FELICIA FRANKLIN (hereinafter “Franklin”), in both her individual and official capacities, by and through her undersigned counsel, and hereby files this Consent Motion to Reschedule Motions Hearing, showing the Court as follows:

The Court previously scheduled a hearing for March 17, 2023, on Defendant Clayton County’s and Defendant Gail Hambrick’s Motion to Dismiss (Doc. 22) and Defendant Alieka Anderson’s Motion for Judgment on the Pleadings (Doc. 29). Defendant Felicia Franklin filed her Motion for Judgment on the Pleadings on March 3, 2023 (Doc. 44). Defendant Franklin requests that the hearing scheduled for March

17, 2023, be reset for a date after time for Plaintiff's response to her Motion for Judgment on the Pleadings and Defendant Franklin's reply, so that all pending motions may be heard together. Based on the time for response and reply, it is requested that the hearing be moved to a date falling after March 31, 2023. All parties have conferred on this matter, and Defendant Franklin is authorized to state that Plaintiff's counsel and other defense counsel have consented to this motion.

Submitted this 6th day of March, 2023.

s/ Melissa A. Tracy
Ken E. Jarrard
Georgia Bar No. 389550

Melissa A. Tracy
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CERTIFICATE OF COMPLIANCE

I hereby certify that the within and foregoing has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

/s/ Melissa A. Tracy
Melissa A. Tracy
Georgia Bar No. 714477
mtracy@jarrard-davis.com

CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing **CONSENT MOTION TO RESCHEDULE MOTIONS HEARING** in the above-styled civil action with the Clerk of Court by using the Court's CM/ECF system, which will automatically send notice of same to the attorneys of record. Additionally, a true and correct copy of same has been delivered to the following counsel of record:

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This 6th day of March, 2023.

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